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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
CHANDRA BRIDGES,
Defendant.

Case No. 2:21-cr-00041-ART-BNW

**UNOPPOSED MOTION TO
AMEND CONDITIONS OF
PRETRIAL RELEASE**

Chandra Bridges, through her attorney of record, Nisha Brooks-Whittington, Assistant Federal Public Defender, files this Unopposed Motion to Amend Conditions of Pretrial Release under 18 U.S.C. § 3142(c)(3). This request stems from the following Memorandum of Points and Authorities.

DATED this 31st day of May, 2022.

RENE L. VALLADARES
Federal Public Defender

By: /s/ *Nisha Brooks-Whittington*

NISHA BROOKS-WHITTINGTON
Assistant Federal Public Defender
Attorney for Chandra Bridges

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 In February 2021, the government filed an Indictment charging Ms. Bridges with false
3 statement during purchase of a firearm in violation of 18 U.S.C. §§ 922(a)(6) and 924(a)(2).
4 ECF No. 1. Ms. Bridges made her initial appearance and pled not guilty to the one count
5 Indictment. ECF No. 4. The Magistrate Judge released Ms. Bridges on a personal
6 recognizance bond with conditions. ECF Nos. 4, 6.

7 Ms. Bridges has remained out of custody pending resolution of her case since March
8 2021. She now seeks to amend two of her conditions. As stated in 18 U.S.C. § 3142(c)(3),
9 “[t]he judicial officer may at any time amend the order to impose additional or different
10 conditions of release.” The first condition Ms. Bridges seeks to amend is the employment
11 condition. That condition currently reads: “The defendant shall maintain or actively seek lawful
12 and verifiable employment and notify Pretrial Services or the supervising officer prior to any
13 change.” ECF No. 6 at 4. Ms. Bridges is actively seeking employment but until she can obtain
14 a job she would like to return to school. As a result, Ms. Bridges requests her conditions be
15 modified to state: “The defendant shall maintain or actively seek lawful and verifiable
16 employment and notify Pretrial Services or the supervising officer prior to any change AND/OR
17 the defendant shall maintain or commence an education or vocational program as directed by
18 Pretrial Services or the supervising officer.”

19 The second condition Ms. Bridges seeks to amend is with respect to “Other Conditions”
20 which state: “The defendant shall avoid all contact directly or indirectly with any known felons
21 or gang members without the prior approval of Pretrial Services. She may have contact with
22 Jeffrey Norton Jr. and Kenneth Bridges.” ECF No. 6 at 5. Under this condition, Ms. Bridges
23 was allowed to have contact with her father, Kenneth Bridges. Mr. Bridges has sadly passed
24 away. Ms. Bridges request his name be removed from the conditions. Ms. Bridges further
25 requests permission to have contact with Calvin Boyden III. Mr. Boyden is Ms. Bridges’
26 husband.

1 Undersigned counsel spoke to Ms. Bridges' assigned Pretrial Services Officer and the
2 Assistant United States Attorney about amending her conditions as stated above. Both the PTS
3 Officer and AUSA are unopposed to this request to amend her conditions.

4 Ms. Bridges requests this Court grant her unopposed motion.

5 DATED this 31st day of May 2022.

6 Respectfully submitted,

7 RENE L. VALLADARES
Federal Public Defender

8 By: /s/ Nisha Brooks-Whittington

9 NISHA BROOKS-WHITTINGTON
10 Assistant Federal Public Defender
Attorney for Chandra Bridges

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12
13 **IT IS SO ORDERED.**

14 
15 Layna J. Zouchah
16 U.S. MAGISTRATE JUDGE

17 Dated: June 1, 2022